

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT

IN RE:

CITY OF DETROIT, MICHIGAN,
Debtor.

Case No. 13-53846-SWR
Honorable STEVEN W. RHODES
Chapter 9

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STIPULATION TO EXTEND THE TIME TO MEET AND CONFER ON
WAYNE COUNTY'S OBJECTION TO REJECTION OF AGREEMENT TO
PURCHASE AND DEVELOP LAND

NOW COME the Charter County of Wayne (the "County") and the City of Detroit (the "City") who hereby stipulate and agree to the terms set forth in this Stipulation as evidenced by the signatures of their respective counsel;

WHEREAS, on January 26, 2015, the County filed *Wayne County's Proof of Claim for Rejection Damages and Objection to Treatment of July 28, 1976 Agreement to Purchase and Develop Land as an Executory Contract* [Docket No. 9108] (the "Objection").

WHEREAS, on February 5, 2015, the City filed its *Reply to Wayne County's Objection to Rejection of Agreement to Purchase and Develop Land* [Docket No. 9174].

WHEREAS, on August 4, 2014, the Court issued an *Order Establishing Procedures with Respect to Rejection of Executory Contracts and Unexpired Leases* [Docket No. 6512], which provides that the parties shall confer to resolve

their disputes relating to the proposed contract rejection for at least seven days after the date of filing the Objection.

WHEREAS, the County and the City request the Court to extend the seven day meet and confer period to 31 days, through February 26, 2015, to allow the parties additional time to discuss resolution of this matter before a hearing is scheduled.

WHEREAS, the County and the City expressly reserve, and do not waive, any substantive or procedural rights that each party may have.

Stipulated to:

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Date: February 9, 2015

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**ORDER EXTENDING THE TIME TO MEET AND CONFER ON WAYNE
COUNTY'S OBJECTION TO REJECTION OF AGREEMENT TO
PURCHASE AND DEVELOP LAND**

This matter having come before the Court on the Stipulation of the Charter County of Wayne ("County") and the City of Detroit ("City"), and the Court being fully advised in the premises.

IT IS HEREBY ORDERED, that the time to meet and confer pursuant to the Order Establishing Procedures with Respect to Rejection of Executory Contracts and Unexpired Leases is extended to 31 days, through February 26, 2015, for the City and County with respect to *Wayne County's Proof of Claim for Rejection Damages and Objection to Treatment of July 28, 1976 Agreement to Purchase and Develop Land as an Executory Contract* [Docket No. 9108] (the "Objection") and the City's *Reply to Wayne County's Objection to Rejection of Agreement to Purchase and Develop Land* [Docket No. 9174] (the "Reply"), provided that nothing herein shall preclude the parties from agreeing to further extend the meet and confer period by stipulation and order of the Court.

IT IS HEREBY FURTHER ORDERED that no hearing on the Objection and the Reply will be set until after the close of the meet and confer period, as extended.

CERTIFICATE OF SERVICE

I, Heather Lennox, hereby certify that the foregoing Stipulation to Extend the Time to Meet and confer on Wayne County's Objection to Rejection of Agreement of Purchase and Develop Land was filed and served via the Court's electronic case filing and noticing system on this 9th day of February, 2015.

/s/ Heather Lennox